## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT STATE OF OKLAHOMA

| (1) | APRIL LAYTON, as personal representative of the Estate of Charles Holdstock, deceased, | )<br>)                 |
|-----|--|------------------------|
| (2) | APRIL LAYTON, individually,  | )                      |
| (3) | VALERIE WINFREY, individually, and   | )                      |
| (4) | MELANIE HUFNAGAL, individually   | )                      |
|     |  | )                      |
|     | Plaintiffs,  | )                      |
|     |  | )                      |
| VS. |  | ) NO. CIV -2009 -1208C |
| (1) | CORRECTIONAL LIEALTHCARE   | )                      |
| (1) | CORRECTIONAL HEALTHCARE MANAGEMENT OF OKLAHOMA,  | )                      |
|     | INC., a corporation,   | )                      |
| (2) | THE BOARD OF COUNTY  | )                      |
| (-) | COMMISSIONERS OF OKLAHOMA  | )                      |
|     | COUNTY, a Political Subdivision of   | )                      |
|     | the State of Oklahoma, and   | )                      |
| (3) | JOHN WHETSEL, individually and in  | )                      |
|     | his capacity as Sheriff of Oklahoma  | )                      |
|     | County.  | )                      |
|     |  | )                      |
|     | Defendants.  | )                      |

## PLAINTIFFS' COUNTER DEPOSITION DESIGNATIONS OF DR. JOSEPH EDWARD PARIS

COME NOW the Plaintiffs and hereby submit their Counter-Designations to the Deposition of Dr. Joseph Edward Paris as follows:

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P. 7, LINES 4-11; 18-25;
P. 8, LINES 7-10; 14-16; 19-21; 24-25
P. 9, LINES 6-13; 22-25
P. 10, LINES 1-6
P. 11, LINES 15-25
P. 12, LINES 1-3; 9-16
P. 13, LINES 1-3; 6-9
P. 14, LINES 11-16, 19
P. 18, LINE 25
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- P. 19, LINES 1-6; 14-18; 21-25
- P. 20, LINES 1, 5-25
- P. 21, LINES 3-12; 15-19
- P. 22, LINES 19-21; 24-25
- P. 23, LINES 1-3; 6-17; 20-24
- P. 24, LINES 19-25
- P. 25, LINES 1-12, 25
- P. 26, LINES 1-6; 9-19; 22-25
- P. 27, LINES 1, 4-20; 23-25
- P 28, LINES 1-3; 11-15, 22-23
- P. 29, LINES 3-8; 13-25
- P. 30, LINES 4-6;
- P. 33, LINES 10-15; 17-19
- P. 37, LINES 20-24
- P. 44, LINES 19-20
- P. 45, LINES 5-18
- P. 47, LINES 25
- P. 48, LINES 1-25
- P. 49, LINES 7-9; 12-25
- P. 50, LINES 1-7
- P. 52, LINES 7-13
- P. 54, LINES 5-6;
- P. 55, LINES 10-12
- P. 56, LINES 8, 19-20
- P. 57, LINES 18-19; 22-23;
- P. 58, LINES 1, 13-15
- P. 60, LINES 14-16
- P. 61, LINES 7-17
- P. 62 LINES 13-16
- P. 66, LINES 9-15
- P. 67, LINES 16-17
- P. 68, LINES 1-3; 10-23
- P. 72, LINES 11-12
- P. 75, LINES 14-22
- P. 84, LINES 1-5
- P. 85, LINES 21-23
- P. 86, LINES 1-17
- P. 90, LINES 18-19
- P. 94, LINES 5-7; 16-19
- P. 102, LINES 7-8
- P. 105, LINES 8-14; 19-24
- P. 106, LINES 16-21
- P. 107, LINES 4-9
- P. 110, LINES 20-21
- P. 113, LINES 2-7
- P 120, LINES 2-4; 6-7

- P 122, LINES 17-25
- P 123, LINES 1-4
- P. 129, LINES 23-25
- P. 130, LINES 18-19
- P, 147, LINES 20-25
- P. 148, LINES 1; 4-10; 13-20
- P. 149, LINES 2-3
- P,. 150, LINES 14-15; 20-21
- P. 151, LINES 8, 17-22
- P. 152, LINES 9-15
- P. 158, LINES 9-16; 18-22
- P. 159, LINES 18-25
- P. 160, LINES 1-10; 18-21
- P. 162, LINES 1-5
- P. 165, LINES 14-18; 21-22
- P. 166 LINES 1-25
- P. 168, LINES 7-9

/s/ E. W. Keller

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of November, 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Ms. Sandi Elliott <u>dasanell@oklahomacounty.org</u>
Ms. Lisa Endres <u>dalisend@oklahomacounty.org</u>

/s/ E. W. Keller